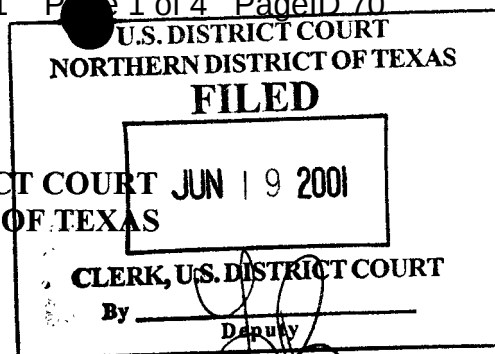


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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ROBERT N. GOLDSTEIN,

Plaintiff,

v.

PHILIP ALEXANDER GORDON
and WWW.CHEATERS.COM,

Defendants.

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No. 3:00-CV-0022-P

**DEFENDANTS' MOTION FOR SANCTIONS
PURSUANT TO RULE 11 OF THE
FEDERAL RULES OF CIVIL PROCEDURE**

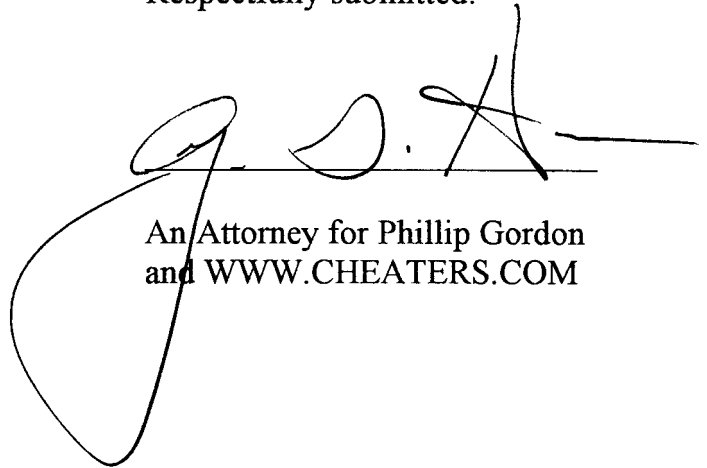
Pursuant to Rule 11 of the Federal Rules of Civil Procedure and the arguments set forth in the accompanying memorandum, www.cheaters.com and Philip Alexander Gordon, as the legal representative of www.cheaters.com, hereby move this Court for an order: (1) instructing Plaintiff's to pay the Defendants' attorneys' fees and costs incurred in connection with their motion to set aside the default judgment and this motion, and (2)

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issuing a reprimand and other sanctions the Court deems appropriate against Plaintiff's counsel.

Dated this 18th day of May, 2001.

Respectfully submitted:

A large, stylized handwritten signature in black ink, appearing to be 'G. D. A.', is written over a horizontal line. The signature is fluid and cursive, with a large loop at the beginning and a long horizontal stroke at the end.

An Attorney for Phillip Gordon
and WWW.CHEATERS.COM

Eugenia S. Hansen
Texas Bar No. 08929720

John A. Dondrea
Texas Bar No. 05973800

William Chad Shear
Texas Bar No. 24013493

Sidley Austin Brown & Wood
717 N. Harwood Ave. Suite 3400
Dallas, TX 75201
Telephone (214) 981-3300
Facsimile (214) 981-3400

CERTIFICATE OF CONFERENCE

I, Eugenia S. Hansen, one of the attorneys for Defendants Philip A. Gordon and www.cheaters.com, hereby certify that on May 21, 2001, I conferred by telephone with Mark Falkin, attorney for Plaintiff Robert N. Goldstein, with regard to the foregoing Motion for Sanctions Pursuant to Rule 11. Mr. Falkin indicated that the motion would be opposed. On June 5 and June 7, 2001, letters transmitting a proposed Certificate of Conference were sent to Mr. Falkin for his consideration; and on June 18, 2001, Mr. Falkin confirmed that the position of his client had not changed and that the foregoing Motion would be opposed.



Eugenia S. Hansen

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of May, 2001, I caused a copy of the foregoing
**DEFENDANTS' MOTION FOR SANCTIONS PURSUANT TO RULE 11 OF THE
FEDERAL RULES OF CIVIL PROCEDURE** to be delivered via hand delivery to:

Mark G. Falkin
Knox Central Place, Suite 1000
4627 North Central Expressway
Dallas, Texas 75205-4022
Attorney for Plaintiff Robert N. Goldstein.

William Chad Shear